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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,	)	Case No.: 3:07-cv-02669 (CEB)(EDL)
Plaintiff,	)	
vs.	)	<b>STIPULATION AND PROPOSED ORDER</b>
JASON INGRASSIA, individually and in	)	<b>FOR CASE MANAGEMENT SCHEDULE</b>
his official capacity; COUNTY OF	)	
CONTRA COSTA; and CITY OF	)	
SAN RAMON.	)	
Defendants.	)	

WHEREAS on August 26, 2008, the parties attended a hearing before Magistrate Judge Laporte, after which the court ordered the parties to submit a proposed case management schedule pursuant to the pretrial and trial dates set by Judge Breyer;

WHEREAS Judge Breyer has set the pretrial hearing for December 2, 2008 and the trial for December 8, 2008;

WHEREAS Judge Breyer advised the parties at the case management conference on July 21, 2008 that the parties could agree upon and determine all other case management scheduling dates, aside from the pretrial and trial dates set;

WHEREAS counsel for the parties have met and agreed upon the proposed case management schedule detailed below;

IT IS HEREBY STIPULATED AND AGREED that the following case management schedule shall govern this case:

1. Fact discovery shall end on September 30, 2008;
2. Expert disclosures shall be hand-delivered by October 6, 2008;
3. Rebuttal expert disclosures shall be hand-delivered by October 22, 2008;
4. Expert discovery shall end on November 5, 2008;
5. All dispositive motions shall be hand-delivered by November 5, 2008;
6. Opposition papers on dispositive motions shall be hand-delivered by November 14, 2008;
7. Reply papers on dispositive motions shall be hand-delivered by November 19, 2008;
8. Dispositive motions shall be heard on November <sup>24</sup>~~21~~, 2008; and
9. The joint pretrial conference statement shall be filed by November 25, 2008

Dated: August 29, 2008  
Oakland, California

**JUSTICE FIRST, LLP**  
Attorneys for Plaintiff Abhinav Bhatnagar  
By:

\_\_\_\_\_  
/s/  
Jenny C. Huang  
2831 Telegraph Avenue  
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Tel.: (510) 628-0695

Dated: August 29, 2008  
Walnut Creek, California

**MCNAMARA, DODGE et al.**  
Attorney for Defendant Jason Ingrassia  
By:

\_\_\_\_\_  
/s/  
Noah Blechman  
1211 Newell Avenue  
Walnut Creek, CA 94596-5331  
Tel.: (925) 939-5330

1 Dated: August 29, 2008  
2 Martinez, California

**GREGORY HARVEY**

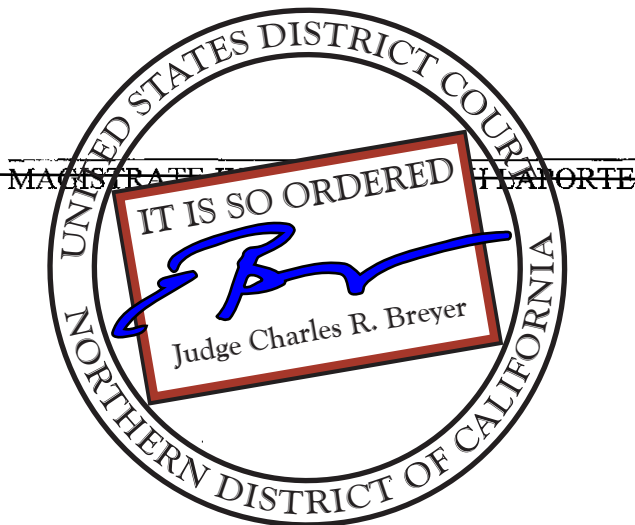
Attorney for Contra Costa County and  
the City of San Ramon

By:

Mr. Gregory Harvey  
Contra Costa County Counsel's Office  
651 Pine Street, 9th Floor  
Martinez, CA 94553

7 IT IS SO ORDERED.

8 Dated: August 03, 2008



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